

Steven J. Pacini  
Direct Dial: 1.617.880.4516  
steven.pacini@lw.com

200 Clarendon Street  
Boston, Massachusetts 02116  
Tel: +1.617.948.6000 Fax: +1.617.948.6001  
www.lw.com

## LATHAM & WATKINS LLP

July 18, 2023

### VIA ECF

The Honorable Jesse M. Furman  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

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**RE: *pulseData, Inc. v. Jung Hoon Son.***  
**C.A. No. 1:23-cv-03653-JMF**

Dear Judge Furman:

To reduce the burden on this Court and the parties in view of a potential settlement, the parties in the above-referenced matter jointly write to request an extension of the submission of a discovery plan as required by Fed. R. Civ. P. 26(f) until 14 days after the settlement conference with Judge Moses, currently scheduled for Tuesday, August 22, 2023 at 2:15pm ET, and a corresponding extension for a Fed. R. Civ. P. 16(b) Scheduling Order. Both the discovery plan and the scheduling order would thus be due on September 5, 2023. The original due date of the discovery plan is Monday, July 24, 2023 and the Scheduling Order is Monday July 31, 2023. There have been no previous requests for extension.

Respectfully submitted,

/s/ Steven J. Pacini  
Steven J. Pacini (admitted *pro hac vice*)  
Of Latham & Watkins LLP  
Counsel for Plaintiff

cc: Counsel of Record (via E-Filing)

Application GRANTED. The conference previously scheduled for August 8, 2023, is hereby rescheduled to September 5, 2023, at 9:00 a.m. and will be held via telephone. The Clerk of Court is directed to terminate ECF No. 30.

SO ORDERED.

July 18, 2023